

BRIAN J. STRETCH (CSBN 163973)  
Acting United States Attorney

KYLE F. WALDINGER (ILSB 6238304)  
Assistant United States Attorney

450 Golden Gate Avenue, 11th Floor  
San Francisco, California 94102  
Telephone: (415) 436-6830  
Facsimile: (415) 436-7234

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 07-0337 MHP
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
	)	<b>UNSEALING THE APPLICATION FOR</b>
v.	)	<b>PERMISSION TO ENTER PLEA OF GUILTY</b>
	)	
JACQUELINE FROEHLICH-L'HEUREAUX,	)	
	)	
Defendant.	)	

The United States of America, by and through its attorney Assistant United States Attorney Kyle F. Waldinger, and the defendant Jacqueline Froehlich-L'Heureaux, by and through her attorney Leland B. Altschuler, hereby stipulate and agree that the Application for Permission to Enter Plea of Guilty in this matter may be unsealed. In further support of this request, the parties state as follows:

1. The defendant entered her plea of guilty in open Court on June 4, 2007. At that time, the Court ordered that the plea-related materials be filed under seal.

2. Since that time, the United States has obtained an Indictment charging the defendants David Nosal and Becky Christian with numerous offenses. That case is numbered CR 08-0237 MHP. Christian's case is set for trial on August 5, 2008.

3. The government intends to produce the defendant Jacqueline Froehlich-

STIPULATION AND [PROPOSED] ORDER  
CR 07-0337 MHP

L’Heureaux’s Application for Permission to Enter Plea of Guilty to the defendants Nosal and Christian because it contains statements of the defendant. Before doing so, the United States seeks to unseal that application. (The Court previously unsealed the plea agreement.)

4. Accordingly, for the reasons stated above, the parties stipulate and agree that the defendant Jacqueline Froehlich-L'Heureaux's Application for Permission to Enter Plea of Guilty should be unsealed. For purposes of clarity, the parties jointly request that the Court unseal the docket entries numbered 5 through 7, which all pertain to the defendant's entry of plea.

SO STIPULATED.

DATED: July 8, 2008

BRIAN J. STRETCH  
Acting United States Attorney

/s/  
KYLE F. WALDINGER  
Assistant United States Attorney

DATED: July 8, 2008

/s/  
LELAND B. ALTSCHULER  
Attorney for defendant Jacqueline Froehlich-  
L'Heureaux

**[PROPOSED] ORDER**

Good cause appearing therefor, it is hereby ordered that the Application for Permission to Enter Plea of Guilty filed in this matter on or about June 4, 2007 is UNSEALED. The Court further orders that the docket entries 5 through 7 be UNSEALED.

DATED: July \_\_, 2008

MARILYN HALL PATEL  
UNITED STATES DISTRICT JUDGE